

EXHIBIT K

1 IN THE UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF CALIFORNIA

3
4 YELLOWCAKE, INC., a California
5 Corporation,

6 Plaintiff,

7 v. Case No:
8 HYPHY MUSIC, INC., 1:20-CV-00988-DAD-BAM
9 Defendant.

10
11 HYPHY MUSIC, INC.,
12 Counterclaimant,
13 v.
14 YELLOWCAKE, INC, COLONIZE MEDIA,
15 INC., JOSE DAVID HERNANDEZ,
16 JESUS CHAVES, SR.,
17 Counterdefendants.

18
19 VIDEOTAPED DEPOSITION OF DOMINGO TORRES FLORES
20 DATE: Wednesday, December 7, 2022
21 TIME: 1:14 p.m.
22 REPORTED BY: Jaime Godinez
23 JOB No.: 13846
24 Conducted by videoconference via the Remote Legal
25 platform

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1 A At the bottom, yes.

2 Q Okay. Does he recognize either of these two
3 signatures?

4 A At the bottom, yes.

5 Q Does he recognize -- does he recognize either
6 of the two signatures on the document to be his
7 signature?

8 A Well, it looks like it, you know.

9 Q Okay. Does he recall ever signing this
10 document?

11 A Me? No. I don't remember anymore. No, no,
12 no.

13 Q My question is did he sign this document?

14 A Well, I don't know what it says. How could I
15 sign it?

16 Q The question is yes or no, did he sign this
17 document?

18 A I'm not sure, you know. I'd have to see
19 the -- the signature better.

20 Q Does he recall ever signing any document with
21 Hyphy music as the other party to the document?

22 A Where I give the rights, the masters, that's
23 my part.

24 Q Could you ask him to explain -- okay.
25 Withdrawn.

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1 Do you recall having a meeting with Mr. Vargas
2 and Mr. Martinez at the offices of Hyphy Music in or
3 about March of 2022?

4 A Around then? Yes, no, I don't remember, but
5 maybe, yes. My son's here with me. He's the one who
6 knows. I don't know.

7 Q I'm asking if he knows. He can answer the
8 question.

9 A I didn't hear it.

10 Q Does he recall meeting with Mr. Vargas and Mr.
11 Martinez at the offices of Hyphy Music in or about March
12 22, 2022?

13 A I don't remember. My son -- my son's the one
14 who knows.

15 Q Tell him again I'm not asking what his son
16 knows. I'm asking what he remembers. He doesn't
17 remember there was such a meeting?

18 A Yes. We've had meetings, but I don't know the
19 date.

20 Q And what were the meetings about?

21 A I don't remember.

22 Q Okay. Who was at these meetings?

23 A Well, perhaps it would have been my son
24 because he's the only one who goes with me.

25 Q Was Mr. Vargas at any of these meetings?

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1 to him -- withdrawn.

2 Did he ever have anybody translate this
3 agreement for him?

4 THE INTERPRETER: Sorry, Counselor, just
5 because I have to translate every -- I want to make sure
6 we're not getting confused. You're speaking to him,
7 correct? Like you? Just because if I translate him --

8 MR. BERMAN: Yeah. Did anybody ever --

9 THE INTERPRETER: Yeah. Thank you.

10 BY MR. BERMAN:

11 Q Did anybody ever translate this document for
12 you?

13 A This one right here? No. Well, it's just
14 that my son takes care of everything. He takes care of
15 everything. I just sign and that's it. He does
16 everything.

17 Q Okay. Does he recall recording an album for
18 the band called El Campesino?

19 A Of course I do, by the Originales de San Juan.

20 Q All right. Did he preform on that -- the
21 recording of that album?

22 MR. BEGAKIS: Objection. Vague.

23 THE INTERPRETER: Again, he is Mr.
24 Torres, correct? Not --

25 MR. BERMAN: Mr. Torres, yes.